

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

United States of America)
v.)
John J. Diamont, Jr.,)
Defendant)
_____)

Criminal No. 05-10154-MLW

OBJECTION TO PROTECTIVE ORDER

Now come Yale Strogoff, Roberta Strogoff, Steven Strogoff and any companies or trusts under their control (“Strogoffs”) and OBJECT to certain portions of the Protective Order (document no. 11 of the above referenced case.)

Specifically, in Paragraph No. 4, “If any Stogoff tax return is admitted into evidence in this case, or otherwise becomes a public record, it shall thereafter be exempt from the requirements of this Protective Order.” Strogoffs object to this statement and request that none of the tax records or returns, or any other document, be admitted into evidence, or otherwise become a public record.

Further, Strogoffs request that the entire Protective Order be subject to approval of both accountants named in the subpoenas requesting these documents, O’Brien Grant Associates and Abrams, Little-Gill Loberfield P.C.; the United States Attorney’s Office; and, the Internal Revenue Service.

Respectfully submitted,
Yale Strogoff,
Roberta Strogoff,
Steven Strogoff
By and through their attorney,

/s/ William A. Brown, Esq.
William A. Brown, Esq.
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CERTIFICATE OF SERVICE

I hereby certify that on this day a true copy of the above document was served upon the attorney of record by ECF filing.

Date March 14, 2006

/s/ William A. Brown, Esq.

William A. Brown

BBO # 061280